

Message

From: Bloeth, Mark [Bloeth.Mark@epa.gov]
Sent: 8/17/2018 1:24:36 PM
To: Gordon, Michael [Gordon.Mike@epa.gov]
CC: Mia, Marcia [Mia.Marcia@epa.gov]
Subject: Coaltec Energy USA and gasification process
Attachments: Region 3 ruling re Section 129.pdf; EPA Letter Ruling re sludge - 7-17-18.pdf; MaxWest letter from the EPA.pdf

Hey Mike & Marcia,

It looks like Coaltec Energy USA is making another similar request to EPA Region 4 to exclude from requirements of Sec. 129, their waste gasification process for drying municipal sewage sludge. Coaltec wants a response letter similar to the Region 3 letters and MaxWest letter issued from EPA previously (see attachments). They want this determination letter before they conduct any demonstration trial burns at Synergy Solutions in Cordele, GA.

I spoke with folks here internally and I'm being told we would need a more formal written request from Coaltec Energy; based on your previous experience, can either of you give me any more background/details about what you required from Coaltec in order for EPA to produce this exemption determination?

Also, if for some reason this sort of request is best suited to be handled by OAQPS please let me know that as well. Thanks in advance for any help you can provide.

Mark Bloeth
US EPA Region 4
Air Enforcement and Toxics Branch
61 Forsyth Street SW
Atlanta, Georgia 30303
(404) 562-9013

From: Peter Thomas [mailto:pthomas@manuregy.com]
Sent: Friday, August 10, 2018 12:09 PM
To: Bloeth, Mark <Bloeth.Mark@epa.gov>
Cc: Dressler, Jason <Dressler.Jason@epa.gov>
Subject: Letter ruling re gasification, please

Mark and Jason,

Mark, Thank you for calling this morning.

As I mentioned, we produce low-cost powdered activated carbon (PAC) at 10 to 12 tons per day, 7 days per week, from dairy manure, hog waste solids, poultry litter, wet distiller's grain, egg layer manure, and spent mushroom substrate. Attached are two engineering drawings of our gasifier / thermal oxidizer system. We can also produce low-cost PAC from municipal and industrial sewage sludge. All of our low-cost PAC can be used on-site as a tertiary-step, water filtration media at WWTPs in order to adsorb heavy metals and organic micropollutants such as antibiotics and other pharmaceuticals, pesticides, hormones, and personal care products.

We have facilities operating in Ohio, Indiana, Nebraska, Georgia, and the Netherlands. We will soon ship two gasifiers to Russia for processing egg layer manure and turkey litter. Our automated, oxygen-starved, refractory-lined, sensor-laden gasification complies with USDA Natural Resource

Conservation Service (NRCS) Practice 735 ("Waste Gasification Facilities" – attached). NRCS Practice 735 was formally approved by EPA Region 3 in September 2016 as an agricultural best management practice for preventing nitrogen and phosphorus runoff into the Chesapeake Bay (see attached "MTT Report Summary" document).

Here is the link to a 3½ minute, narrated YouTube video of our waste gasification facility at River View Farms in Orange County, Indiana. At this facility, we are processing turkey litter, egg layer pullet manure, hog waste solids, and animal mortality compost: <https://www.youtube.com/watch?v=sVSRNxrCJWs>

EPA Headquarters issued the attached Letter Ruling to a company called MaxWest in December 2013, confirming that their oxygen-starved gasification at the Sanford, Florida WWTP was not a solids waste incinerator. EPA Region 3 issued the attached Letter Ruling to us on July 17, 2018, confirming that our waste gasification system is not a sewage sludge incinerator (SSI) when we are drying and processing sewage sludge for the production of powdered activated carbon (PAC). On August 17, 2017, EPA Region 3 issued the attached Letter Ruling to us regarding our processing of poultry litter.

Attached is a very relevant sewage sludge gasification article that was presented at the Water Environment Federation (WEF) Residuals and Biosolids Conference in April 2017.

Here is the link to a YouTube video describing the powdered activated charcoal, gasification and organic micro-pollutant adsorption study that the city of Mannheim, Germany has been conducting at its wastewater treatment plant: <https://youtu.be/188CPDgJw6c>

We are in discussions with officials at the Wilmington, Pittsburgh, and Detroit WWTPs about processing their sewage sludge, and Calgon Carbon Corporation is interested in entering into a joint venture with us. All three of these WWTPs and Calgon Carbon want us to demonstrate that we can dry and process sewage sludge, and our facility in Cordele, Georgia would be the most appropriate location. Synergy Solutions recently began operating our waste gasification system at the public landfill in Cordele, Georgia, where they are processing food waste and cardboard. We would like to process one or two truckloads of sewage sludge from the Cordele WWTP as a demonstration project, since the WWTP is currently disposing of their sewage sludge at this landfill.

We would appreciate it if you would send us a ruling similar to the letter that Region 3 sent us on July 17, 2018, confirming that our gasification system is not a solid waste incinerator when we are processing sewage sludge for the production of powdered activated carbon.

Regards,

Peter Thomas

Coaltec Energy USA, Inc.

434-989-1417 (Cell)

www.coaltecenergy.com

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